



S1C / ALL

Transmittal Number: 23948592  
Date Processed: 10/21/2021

## Notice of Service of Process

**Primary Contact:** WF West - WF Bank  
 Corporation Service Company- Wilmington, DELAWARE  
 251 Little Falls Dr  
 Wilmington, DE 19808-1674

**Entity:** Wells Fargo & Company  
 Entity ID Number 1915501

**Entity Served:** Wells Fargo & Company

**Title of Action:** Bernard C. Baier vs. Wells Fargo & Company

**Matter Name/ID:** Bernard C. Baier vs. Wells Fargo & Company (11665643)

**Document(s) Type:** Summons/Complaint

**Nature of Action:** Personal Injury

**Court/Agency:** Hennepin County District Court, MN

**Case/Reference No:** Not Shown

**Jurisdiction Served:** Minnesota

**Date Served on CSC:** 10/20/2021

**Answer or Appearance Due:** 21 Days

**Originally Served On:** CSC

**How Served:** Personal Service

**Sender Information:** Schmidt & Salita  
 952-473-4530

**Client Requested Information:** Matter Management User Groups: [Risk Management]  
 Routing Rules (CSC): R1282  
 Classification: Standard

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**To avoid potential delay, please do not send your response to CSC**

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | [sop@cscglobal.com](mailto:sop@cscglobal.com)

**EXHIBIT  
A**

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

Bernard Charles Baier,

Court File Number:  
Case Type: Personal Injury

Plaintiff,

v.

**SUMMONS**

Wells Fargo & Company,

Defendant.

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THIS SUMMONS IS DIRECTED TO WELLS FARGO & COMPANY.

**1. YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this summons.

**2. YOU MUST REPLY WITHIN 21 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this summons a **written response** called an Answer within 21 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this summons located at:

Schmidt & Salita Law Firm, 13911 Ridgedale Drive, Suite 325, Minnetonka, MN 55305.

**3. YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

**4. YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS**

**SUMMONS.** If you do not Answer within 21 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the complaint. If you do not want to contest the claims stated in the complaint, you do not need to respond. A default judgment can then be entered against you for the relief requested in the complaint.

**5. LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. **Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.**

**6. ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

**SCHMIDT & SALITA**

Dated 10/19/2021

s/Stephanie J. Schommer  
Douglas E. Schmidt (#96921)  
Stephanie J. Schommer (#0389123)  
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STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

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Bernard C. Baier,

Court File Number:  
Case Type: Personal Injury

Plaintiff,

**COMPLAINT**

v.

Wells Fargo & Company,

Defendant.

---

COMES NOW the Plaintiff for cause of action against the Defendant, alleges and states as follows:

I.

The Plaintiff, Bernard C. Baier, at all times material and relevant hereto, resides in the City of Golden Valley, County of Hennepin, State of Minnesota.

II.

That, upon information and belief, at all times material herein, Defendant Wells Fargo & Company (hereinafter, "Wells Fargo") is a business corporation (foreign) with a registered office address of 2345 Rice Street, Suite 230, in the City of Roseville, State of Minnesota.

III.

That, upon information and belief, at all times material herein, Defendant Wells

Fargo has been at all times material hereto, the owners/occupiers and/or managers of premises located at 900 East Wayzata Boulevard, Wayzata, MN 55391.

IV.

That, upon information and belief, on or about October 23, 2019, the Plaintiff, Bernard C. Baier, was a public visitor lawfully upon the premises.

V.

That, upon information and belief, at the time and place aforesaid, the Defendant, by their agents, servants, and/or employees, were under a duty to keep, inspect, possess, supervise, maintain and repair said premise and to warn invitees of any defective condition.

VI.

That, upon information and belief, notwithstanding this duty, the defendant, by their agents, servants, workmen and/or employees, did on the date aforesaid, and for some time prior thereto, carelessly, recklessly and negligently permit and allow a trip hazard on their sidewalk to be, become and remain in a highly dangerous, defective and unsafe condition located on the said premises.

VII.

That, upon information and belief, on the aforesaid date and time, while Plaintiff Bernard C. Baier, was a lawful public visitor located on the premises of the defendant, he stepped onto the defective sidewalk and fell, as a result of which, plaintiff sustained severe and serious permanent personal injuries.

VIII.

That, upon information and belief, Plaintiff avers that defendant, by their agents,

servants, workmen and/or employees, had or should have had notice of the existence of the said dangerous, defective and unsafe condition upon the premises above-mentioned prior to the happening of the said slip and fall, and allowed this dangerous, defective and unsafe condition to exist for an unreasonable period of time and had a duty to correct.

IX.

That as a direct and proximate result of the negligence of the Defendant, the Plaintiff was severely and permanently injured so that he has in the past and will in the future suffer bodily injury, disability, disfigurement, pain and suffering, mental anguish, loss of enjoyment of life, the expenses of health care treatments and the loss of earnings and earning capacity.

WHEREFORE, the Plaintiff prays for judgment against the Defendant in an amount in excess of \$50,000 Dollars, together with interest, costs (both post-judgment and pre-judgment), and disbursements and attorneys fees as allowed by law.

**SCHMIDT & SALITA**

Dated 10/19/2021

s/Stephanie J. Schommer  
Douglas E. Schmidt (#96921)  
Stephanie J. Schommer (#0389123)  
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**ACKNOWLEDGMENT REQUIRED BY  
MINN. STAT. SEC. 549.21, SUBD. 1**

The undersigned hereby acknowledges that costs, disbursements, and reasonable attorney and witness fees may be awarded pursuant to Minn. Stat. Sec. 549.211, to the party against whom the allegations in this pleading are asserted.

**SCHMIDT & SALITA**

Dated 10/19/2021

s/Stephanie J. Schommer  
Douglas E. Schmidt (#96921)  
Stephanie J. Schommer (#0389123)  
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